

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	Docket No. 01-0662
Investigation Concerning Illinois Bell)	
Telephone Company's Compliance with)	
Section 271 of the Telecommunications Act of 1996)	

**PHASE 2 SURREBUTTAL AFFIDAVIT OF JUSTIN W. BROWN
ON BEHALF OF SBC ILLINOIS**

SBC ILLINOIS EXHIBIT 9.1

(PUBLIC VERSION)

Dated: March 17, 2003

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I, Justin W. Brown, being of lawful age and duly sworn upon my oath, do hereby depose and state as follows:

INTRODUCTION

1. My name is Justin W. Brown. My business address is 790 North Milwaukee, Milwaukee, Wisconsin. I am the same Justin W. Brown who sponsored affidavits previously in this proceeding.

PURPOSE OF AFFIDAVIT

2. The purpose of this affidavit is to respond to rebuttal comments submitted by various CLECs and interveners in this proceeding regarding the Local Service Centers (“LSC”) and Local Operations Centers (“LOC”). Specifically, I address comments made by Forte Communications and WorldCom regarding erroneous Service Order Completion notices, Working Service Conflicts and billing for the UNE-P.

ERRONEOUS SOC

3. In its Phase 2 Rebuttal affidavit, WorldCom continues to object to the way in which SBC Illinois handles incorrect Service Order Completion notices (Lichtenberg ¶¶ 28-31). As explained in the LSC Rebuttal Affidavit filed earlier in this docket, manual errors do occur that may result in an erroneous SOC being sent to a CLEC. These occurrences, however, are truly the exception and not the rule¹.

¹ Brown Phase 2 Rebuttal Affidavit ¶ 22, Table 1 and Table 2.

4. SBC Illinois issues SOC's in error at a rate of only .005%.² Although Ms. Lichtenberg claims that my earlier affidavit "fails to explain why it is that the order completed in the first place" (Lichtenberg ¶29), in fact, it was clearly stated that the "root cause" for incorrect SOC's is human error and an example was provided of how that can happen (Brown Rebuttal Aff. ¶ 22 fn. 4). Although SBC Illinois makes every effort to avoid manual errors in the SOC process, it would be impossible to eliminate them altogether and SBC Illinois' current operational record in this area is excellent.
5. WorldCom's principle complaint appears to be that it receives notification that the SOC was sent in error though e-mail, rather than a Line Loss Notice ("LLN"). As explained in the LSC Rebuttal Affidavit, SBC Illinois believes that using the e-mail process is superior to using the LLN process (Brown Rebuttal Aff. ¶ 24). A LLN is not appropriate here, because, in fact, this customer was never WorldCom's in the first place and, therefore, the customer has not been "lost". WorldCom's comments, however, suggest that *its* systems would process these notices better in the LLN format, rather than e-mail. If that is the issue here, and it appears to be, then WorldCom should present a proposal to use the LLN format for incorrect SOC notifications at the next Change Management meeting, where the issue could be explored on an industry-wide basis.
6. Finally, Ms. Lichtenberg expresses concern that these erroneous SOC's are not reflected in SBC Illinois' performance measures (Lichtenberg ¶ 30). Given the extremely small number of incorrect SOC's that are issued, it is unlikely that they

² 2,451,600 regional mechanized SOC's sent to CLECs during September 2002 through January 2003/111
Total SOC's sent to CLECs in error X 100 = .005%

would have any impact on the performance measures. Using the five-state September-January data included in my Rebuttal Affidavit (i.e. that 111 or .005% of all SOC's were sent in error) and assuming that all of these SOC's were considered "misses" for purposes of PM 7.1, the impact would be statistically insignificant on a base of 2,451,711 SOC's (including the 111 incorrect SOC's).

WORKING SERVICE CONFLICT ("WSC")

7. WorldCom continues to object to SBC Illinois' decision to use a facsimile process in forwarding WSC forms to the CLECs (Lichtenberg ¶ 33). Ms. Lichtenberg states that the larger CLECs had expressed concerns about a facsimile process when it was first proposed and did request that an email process be considered. Ms. Lichtenberg is correct. SBC Illinois, however, ultimately adopted a facsimile notification process out of a concern that it was more appropriate for some of the smaller CLECs that rely heavily on manual, FAX-based processes. I would note that the FAX process has worked. Nevertheless, given WorldCom's continuing concerns over this process issue, SBC Illinois is perfectly willing to reconsider implementing an alternative email notification process and will raise it in the next CLEC User Forum.
8. Forte also submitted comments regarding the Working Service Conflict (WSC) process. Forte contends that it repeatedly receives WSC notices late (Forte Reply Aff. at 9-11). Prior to addressing Forte's allegations, it is important to understand the process that occurs in the Local Service Center upon discovery of a WSC situation. When a CLEC submits an order for new residential Resale or UNE-P service, as part of the provisioning process, SBC Illinois' downstream systems

attempt to assign facilities for that order. If there is currently existing telephone service present at the same address as shown on the CLEC order, the assignment system recognizes a “working service conflict.” Once a WSC situation is discovered, the MEDS (**M**echanized **E**SOI (Error Service Order Image) **D**elivery **S**ystem) routes the WSC ESOIs to a internal website where they are retrieved on a continuous basis by a team of service representatives who type up notifications to the CLEC (referred to as “WS1a” forms) and fax them to the CLEC who submitted the order for the new service. Additionally, the service representative changes the due date of the order to “x”, because the conflict must be resolved before a due date can be established. If the CLEC does not send a supplemental order within 30 days specifying what SBC Illinois should do with the order, the order will be cancelled.

9. In my Rebuttal Affidavit, it was noted that the investigation into Forte’s WSC issues was ongoing. Since that Affidavit was filed, SBC Illinois has determined that there has been a timing issue between when service representatives in the LSC faxed the WS1a forms to Forte and when the working service conflict was initially identified by the LSC. Some service representatives were “batching” the faxes instead of sending them individually. For a relatively small CLEC like Forte (whose WS1a forms would accumulate slowly, compared to larger carriers), this had the unintended consequence of delaying the issuance of many WSC notices to or beyond the service due date. This problem has already been corrected. Effective March 12, 2003, service representatives have been instructed to fax the WS1a forms every fifteen minutes and are doing so.

10. Additionally, Forte has agreed to partner with SBC for a trial process in which the forms will be faxed to the CLEC from the service representative's workstation immediately upon completion of the WS1a form. This trial will begin within the next two weeks and the results of the trial will be shared with the CLEC community at the CLEC User Forum.
11. Forte also points out five working service conflict forms that were sent to Forte in error because they belonged to another CLEC (Forte Reply Aff. at 10 fn. 11). Unfortunately, the misdirection of these five forms was the result of human error on the part of a service representative. It is believed that the forms were mistakenly mixed into Forte's WS1a forms during the batch faxing process. SBC Illinois believes that this was a relatively isolated event. The recently implemented process of faxing WS1a forms every fifteen minutes should reduce the likelihood that CLEC notifications will become commingled. Moreover, the process to be trialed with Forte should reduce the likelihood of misdirected facsimiles even further, since the WS1a forms will be faxed directly from the workstations of the service representatives preparing the WS1a's.

MISSING SOC's AND CANCELLATIONS

12. WorldCom again makes reference to the fact that it could not send spreadsheets containing missing notifiers including SOC's and erroneous cancellations to the LSC for a period of time and states that it "looks forward" to reinstituting this process (Lichtenberg ¶¶ 35-36). In fact, WorldCom is already sending the LSC these spreadsheets, the most recent being February 27, 2003.

13. Finally, WorldCom suggests that SBC Illinois “must stop canceling orders erroneously” (Lichtenberg ¶ 39), and suggests that manual processes are the cause (Lichtenberg ¶ 37). Specifically, Ms. Lichtenberg identifies 160 orders for which it (WorldCom) had not received a completion notice in November or December and 135 in February across the entire 5-state region. In fact, this is a very small number of orders and they are in no way indicative of any systemic problem in SBC Illinois’ operations. During the months of November 2002 and December 2002, for example, WorldCom received ***** Firm Order Confirmations (“FOC”). If 160 of WorldCom’s requests were missing or cancelled, that would represent only ***** of WorldCom’s ordering activity during the period. Again, although SBC Illinois makes every effort to complete every CLEC order correctly, no process is perfect and this level of error is simply not significant.

INVALID USOCs

14. WorldCom states that invalid USOCs have appeared on its UNE-P bills. Although an OSS component of this issue will be addressed further in the affidavit of Mark Cottrell and Denise Kagan, human error on the part of LSC service representatives is a contributing factor to invalid USOCs on orders. Four USOCs were previously identified by SBC as not applicable to UNE-P ordering or provisioning (Lichtenberg ¶ 7). Those four USOCs are: NR9UU, SEPUP, UJR, and UPC. These USOCs were analyzed for the months of October – December 2002. The result of the analysis of WorldCom orders is in the table below.

*****CONFIDENTIAL CHART*****

	Oct-02	Nov-02	Dec-02
NR9UU	**	**	**
UNE-P PONS	***	***	***
% of UNE-P PONS			
SEPUP	**	***	***
UNE-P Lines	***	***	**
% of UNE-P Lines	***	***	***
UJR	***	****	****
UNE-P Lines	***	****	****
% of UNE-P Lines	***	****	****
UPC	***	****	****
UNE-P Lines	***	****	****
% of UNE-P Lines	***	****	****

15. Since SBC has determined that the USOCs listed above were not added by the system for the months of October-December 2002, a service representative must have mistakenly added them. While SBC does strive to eliminate human error, as with any manual process, human error does occur. As can be seen in the chart above, however, the invalid application of these four USOCs impacts an extremely small percentage of WorldCom's UNE-P orders. When the CLEC discovers errors like these, they are encouraged to contact the LSC Billing team for resolution. The LSC Billing Team stands ready to work with CLECs on a business-to-business basis to resolve all billing issues.
16. Additionally, SBC Illinois will continue to work to reduce the incidence of human error. SBC Illinois is in the process of clarifying its Method and Procedure (M&P) documents relative to these USOCs. Once the M&P documents are

updated, SBC Illinois will notify all service representatives that a change has been made to the M&P that requires their review.

17. This concludes my affidavit.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on _____, 2003.

Justin W. Brown
General Manager—Regulatory Support

STATE OF WISCONSIN)
COUNTY OF MILWAUKEE)

Subscribed and sworn to before me this _____ day of _____, 2003.

Notary Public